

PAGING NETWORK, INC.
Comments on 900 MHz Narrowband PCS

Interest: Paging company; also potential narrowband PCS provider; applicant for pioneer's preference for VoiceNow.

Band Plan:

- Believes 250 kHz asymmetrical grants could be achieved by dividing the 940 MHz band into 5 blocks and pairing 200 kHz blocks with 25 kHz channels for return link pager-to-transmitter communications at 901 MHz, and 25 kHz signalling channels at 930 MHz. In the alternative, four 250 kHz channels could be allocated. (pp. 12-13). Believes that the FCC's allocation of 3 MHz for narrowband PCS is too conservative. (p. 22)

Amount of Spectrum per licensed system:

- 25 kHz to 250 kHz. (p. 12)

Service Areas:

- Urges the FCC to establish nationwide and up to five regional service areas. (p. 9)

Cellular carrier participation:

- Suggests that the public interest would best be served by imposing no eligibility restrictions on AMS licensing. Rather, incumbents can most appropriately utilize these frequencies. (p. 23)

Local exchange carrier participation:

- Same as above.

Licensing policies:

- Supports no limitations on multiple licenses. (p. 23)
- Believes competitive bidding would be the most appropriate mechanism for licensing AMS, and urges the Commission, if it determines that it lacks legal authority to conduct auctions, to seek experimental authority from Congress to conduct auctions for the 3 MHz of AMS frequencies. (p. 19) Lotteries should be considered only if FCC does not have and cannot obtain auction authority, and then only for nationwide licenses of various bandwidths, ranging from 25 to 250 kHz. (p. 20)

Regulatory status:

- Advocates the adoption of a flexible regulatory approach, permitting licensees to choose common or private carriage and, in the case of nationwide licensees, to elect to operate as a private or common carrier on a market by market basis. (p. 26)
- Interconnection rights should not differ depending on whether an advanced paging service provider is classified as a common carrier or a private carrier. Asserts that differences in interconnection rates charged to private versus common carriers constitute unreasonable discrimination under §202(a) of the Communications Act. (p. 29)

Other issues:

- Again requests the Commission to create separate procedural tracks for AMS and broadband PCS. (p. 2, footnote 2)
- Requests reconsideration of the FCC's Tentative Decision denying PageNet's pioneer's preference for failure to meet its burden of demonstrating that VoiceNow is "new" or "innovative." (p. 29)
 - Asserts that the FCC failed to apply its established criteria in awarding pioneer preferences. Specifically, the FCC has arbitrarily construed "innovation" and seems more disposed toward rewarding "invention" than "innovation." (pp. 34-35)
 - Suggests that VoiceNow is innovative because it is in essence a new service (p. 38), it will satisfy a previously unserved market (pp. 39-40), and it satisfies the same standard for innovation as Mtel since both PageNet and Mtel apply existing technologies to new services (pp. 44-46). Further states that its bit rates far exceed those proposed by Mtel and that VoiceNow will increase spectrum efficiency and reduce cost. (pp. 46-50)

SOUTHWESTERN BELL CORPORATION
Comments on 900 MHz Narrowband PCS

Interest: Common carrier telephone company and cellular and paging licensee.

Band plan:

- The 930-931 MHz band should be divided into separate 25 or 50 kHz blocks. (p. 5)

Service areas:

- Believes that the FCC should allocate the 900 MHz narrowband channels on a regional basis, using either the 10 Standard Federal Government Regions or the Census Bureau's 9 divisions. (pp. 5-6)

Regulatory status:

- Regulation of the narrowband 900 MHz services should be equal for all licensees -- specifically, if any PCS provider is deemed a common carrier, then all PCS providers should be regulated as common carriers. (p. 6)

Other issues:

- Believes the 900 MHz issues should be resolved separately. (pp. 3-4)

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**TELECOMMUNICATIONS INDUSTRY ASSOCIATION,
MOBILE COMMUNICATIONS DIVISION
Comments on 900 MHz Narrowband PCS**

Interest: Trade association for manufacturers of wireless communications products.

Technical standards:

- Band parameters inadvertently propose to mix low power mobiles side-by-side with 3500 watt base stations; the 940-941 MHz band should be limited to mobile operations. (pp. 11-12).

TELOCATOR
THE PERSONAL COMMUNICATIONS INDUSTRY ASSOCIATION
Comments on 900 MHz Narrowband PCS

Interest:

- Trade association that represents entities involved in personal communications services.

Band plan:

- Supports treating the 901-902, 930-931, and 940-941 MHz frequency bands as a whole and designating these bands for advanced messaging services. (p. 6)
- Supports a channeling plan that maximizes entry opportunities for numerous and different narrowband PCS service providers. (p. 8)
- States that most narrowband PCS services can be offered in 50 kHz or 25 kHz channels while others may require greater bandwidths. (p. 9)
- Believes that many two way services could rely upon asymmetrical channel assignments, i.e., where the return channel link uses less bandwidth than the forward channel link. (p. 9)

Service areas:

- Supports nationwide licenses and licenses that cover five specified regional markets. (p. 12)

Cellular and local exchange carrier participation:

- Supports a policy that neither prefers nor excludes any qualified applicant. Opposes limitations on cellular and telephone company eligibility. (p. 9)

Licensing policies:

- Supports lottery reforms to impose financial qualification criteria and high application fees while prohibiting pre-lottery settlements. (p. 14)
- Supports stringent construction and service requirements. (p. 14)
- Opposes post-licensing restrictions on the sale or transfer of authorizations. (p. 15)

Regulatory status:

- Supports licensees being able to self-designate whether to operate as private carriers or common carriers. (p. 15)
- Believes that narrowband PCS should have interconnection that is reasonable for the particular PCS system and no less favorable than that offered by the LEC to any other customer or carrier. (p. 17)

Technical standards:

- States that the Commission should not adopt any particular modulation scheme or interoperability standard for narrowband PCS. (p. 17)
- Supports the proposed power, height, and interference standards for the 930-931 MHz and 940-941 MHz bands but believes that the 901-902 MHz band should be restricted to low power operations (7 watts ERP). (p. 18)

UNITED STATES SMALL BUSINESS ADMINISTRATION
Comments on 900 MHz Narrowband PCS

Interest: Governmental agency

Amount of spectrum per licensed system:

- Given the diverse needs of proposed services, the Commission should allow the marketplace to determine the appropriate allocation (15).

Service areas:

- Given the more regional nature of paging service, the Commission should adopt large regional licensing areas. The Commission should examine the 47 Major Trading Areas and others. (19-21).

Licensing policies:

- Supports a post-card lottery process (24).
- Urges the Commission to take strong action against the potential abuses of application mills (25-26).
- Urges the Commission to prohibit the assignment or transfer of PCS licenses for a set period of time (26).

Regulatory status:

- Supports efforts to replace rate regulation with control of prices through market competition (28).
- Supports proposal to permit interconnection comparable to that received by other customers of the PSTN (28).
- PCS should be classified as common carrier (28-29).

UNITED STATES TELEPHONE ASSOCIATION
Comments on 900 Narrowband PCS

Interest: Trade association of exchange carrier industry

Band Plan:

- 1900-1910/1980-1990 MHz for one unlicensed paired channel set of 20 MHz for narrowband applications.
- Suggests that Commission attempt to identify additional frequencies that would be suitable for unlicensed narrowband PCS applications. (p. 31).
- States that providing separate allocations for unlicensed narrowband and broadband applications will reduce potential interference. (p. 31).

UTILITIES TELECOMMUNICATIONS COUNCIL
Comments on 900 MHz Narrowband PCS

Interest: National representative on communications matters for the nation's electric, gas, water and steam utilities.

Band plan:

- If the Commission allocates spectrum in the 900 MHz band for PCS, the Commission should apportion 1 MHz for non-commercial, internal use by traditional private radio eligibles (30).

Service areas:

- 900 MHz PCS systems should be licensed by LATAs or Major Trading Areas to avoid consolidation costs (33).

Cellular carrier participation:

- Incumbent cellular licensees should not be excluded from PCS licensing either within or outside their service areas (33).

Local exchange carrier participation:

- Does not oppose to LECs holding licenses in the 900 MHz PCS band with safeguards (34).

Licensing policies:

- The Commission should decide questions regarding licensee mergers on a case-by-case basis, rather than imposing spectrum caps (34).
- Supports 10 year license term with a high renewal expectancy (35).
- Lotteries should be used to select PCS licensees for both non-commercial and commercial PCS licenses. Strongly opposes competitive bidding (35, 37).
- To minimize speculation, supports short filing windows, reasonably high filing fees, more stringent entry requirements, narrow eligibility requirements, submission of engineering documentation and firm financial commitment letter with application, strict construction and operation requirements, and resale restrictions (35-36).

Regulatory status:

- PCS should be regulated on a private carrier basis to ensure flexibility for future development (38-39).
- Supports giving PCS licensees a federally protected right to interconnect with the PSTN (39-40).

Technical standards:

- 900 MHz PCS power and antenna height limits are excessive and could cause interference (40).
- The proposed out-of-band emission limits are not sufficiently stringent (41).